

REMARKS

This Amendment is filed in response to the Office Action mailed July 17, 2006.
All objections and rejections are respectfully traversed.

Claims 1-40 are in the case.

Claims 36-40 were added to better claim the invention.

Claims 1, 9, 17, 27 and 28 have been amended to correct typographical errors.
Applicant would like to thank Examiner for pointing out these typographical errors.

Rejections Under 35 U.S.C. § 102

At paragraph 1 of the Office Action, claims 1-34 were rejected under 35 U.S.C. §102(e) as being anticipated by Grosner et al., U.S. Publication No. 2004/0078467 published on April 22, 2004 (hereinafter "Grosner").

Applicant's amended claim 1, representative in part of the present invention states:

1. A method for proxying data access commands from a first storage system to a second storage system in a storage system cluster, the method comprising the steps of:

receiving a data access command at the first storage system that is directed to the second storage system;

forwarding the received data access command to the second storage system via a cluster interconnect;

processing the data access command at the second storage system;
returning a response from the second storage system to the first storage system via the cluster interconnect; and

sending a response to the data access command to a client from the first storage system.

Applicant respectfully urges that Grosner does not show Applicant's novel "***receiving a data access command at the first storage system that is directed to the second storage system; forwarding the received data access command to the second storage system via a cluster interconnect.***"

Grosner teaches in part a method for providing a switching system in order interconnect a multitude of processors (Summary). Based on the number of access requests a file receives, Grosner automatically decides if the file should be served by a single server or multiple servers (paragraph 315-317). For example, "files that are lightly accessed, i.e. have a low number of accesses per second, only need to be served by a single server. Files that are heavily accessed are served by more than one server" (paragraph 315-317). If it has been decided that a single server is required, then *only* that server is used to process the request. Should that server fail, then another server is utilized after a "retry" (paragraph 194). If it has been decided that multiple servers are required, Grosner employs a hash table to supply IP addresses for the specific and *predetermined* server to which the request should be directed (paragraph 312). Should any of the multiple servers fail, then the remaining servers are load balanced (paragraph 194). However, Grosner is silent regarding a server that has lost connectivity being used as a proxy for a working server.

Applicant respectfully urges that the Grosner publication is legally precluded from anticipating the claimed invention under 35 U.S.C. § 102 because of the absence from the Grosner patent of Applicant's novel use of "***receiving a data access command at the first storage system that is directed to the second storage system; forwarding the received data access command to the second storage system via a cluster interconnect.***"

Similarly, independent claims 27, 28 and dependent claims 2-8 and 29-34 also include limitations of ***“receiving a data access command at the first storage system that is directed to the second storage system; forwarding the received data access command to the second storage system via a cluster interconnect.”*** As noted above, Grosner does not teach or disclose the concept of ***“receiving a data access command at the first storage system that is directed to the second storage system; forwarding the received data access command to the second storage system via a cluster interconnect.”*** As such, Grosner does not anticipate these claims.

Applicant’s claim 9, representative in part of the present invention states:

9. A system adapted to proxy data access commands from a first storage system to a second storage system connected via a cluster interconnect, the system comprising:

a virtual target module interfacing with a virtual adapter on the first storage system, a virtual target module adapted to make a forwarding decision of a received data access request to thereby forward the request to the second storage system.

Applicant respectfully urges that Grosner does not show Applicant’s novel ***“a virtual target module interfacing with a virtual adapter on the first storage system, a virtual target module adapted to make a forwarding decision of a received data access request to thereby forward the request to the second storage system.”***

As noted above, Grosner is completely silent to Applicant’s novel concept of a first storage system forwarding received data access requests to a second storage system. Thus, Applicant respectfully urges that the Grosner publication is legally precluded from anticipating the claimed invention under 35 U.S.C. § 102 because of the absence from the Grosner patent of Applicant’s novel use of ***“a virtual target module interfacing with a virtual adapter on the first storage system, a virtual target module adapted to make a***

forwarding decision of a received data access request to thereby forward the request to the second storage system.”

Similarly, independent claims 12, 17 and dependent claims 10, 11, 13-16 and 18-26 also include limitations of ***a first storage system, forwarding a received data access request to a second storage system***. As noted above, Grosner does not teach or disclose the concept of ***a first storage system, forwarding a received data access request to a second storage system***. As such, Grosner does not anticipate these claims.

All independent claims are believed to be in condition for allowance.

All dependent claims are believed to be dependent from allowable independent claims, and therefore in condition for allowance.

Favorable action is respectfully solicited.

Should the Examiner feel personal contact is required to discuss this matter further, please do not hesitate to call the undersigned attorney at (617) 951-2500.

Please charge any additional fee occasioned by this paper to our Deposit Account

No. 03-1237.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Duane H. Dreger", is written over a horizontal line.

Duane H. Dreger

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